# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA WESTERN DIVISION

MICHAEL W. RONDINI, as	)	
Administrator and Personal	)	
Representative for the Estate of MEGAN	)	
ELIZABETH RONDINI,	)	
Deceased,	)	
Plaintiff,	)	
v.	)	CASE NUMBER
	)	7:17-CV-01114-RDP
	)	
TERRY J. BUNN, JR.,	)	
	)	
	)	
Defendant.	)	

# **DEFENDANT'S EXHIBIT LIST**

**COMES NOW** defendant, Terry J. Bunn, Jr. ("Bunn"), and reserves the right to introduce some or all of the following exhibits at the trial of this case presently scheduled for September 20, 2021, and submits this Exhibit List to state as follows:

 Lakeway Psychiatry and Behavioral Health (Austin, Texas) Initial Session Evaluation of Megan Rondini dated November 17, 2015 signed by Sydney Payne-UPC-Intern;

- 2. Lakeway Psychiatry and Behavioral Health (Austin, Texas) Initial Evaluation of Megan Rondini/SOAP Note by Dr. Ziba Rezaee dated October 20, 2015;
- 3. Betty Bewley Therapy Notes of Therapy Sessions with Megan Rondini dated July 7, 2015 and July 14, 2015 (Spicewood, Texas);
- DCH Regional Medical Center Regional Medical Center Chart Release
   Cover Sheet dated June 24, 2016 to Cory Watson regarding Megan
   Rondini;
- 5. DCH Regional Medical Center Patient Information of Megan Rondini dated July 2, 2015;
- 6. DCH Regional Medical Center Emergency Room Ledger of Megan Rondini dated July 5, 2015;
- 7. DCH Regional Medical Center Emergency Department Physician records related to Megan Rondini, including, but not limited to, those records dated July 2, 2015;
- 8. DCH Regional Medical Center Emergency Department Triage;
- 9. DCH Regional Medical Center Emergency Department Physician Order;
- 10. DCH Regional Medical Center Discharge Instructions;

- 11. DCH Regional Medical Center POM Physician Order Summary dated July 3, 2015;
- 12. DCH Regional Medical Center Lab Discharge Summary/Chain of Custody dated July 7, 2015;
- 13. DCH Regional Medical Center Electronic Medication Record dated July 2, 2015;
- 14. DCH Regional Medical Center Nurses' notes;
- 15. DCH Regional Medical Center Consents dated July 2, 2015;
- 16. DCH Regional Medical Center Health History forms;
- 17. Police/Sheriff interview (videos, audios and transcripts) of Bunn;
- 18. Dr. Arnold's psychiatric evaluation visit notes, reports and communications, and notes relating to Megan Rondini;
- DCH Regional Medical Center Homecare Instructions/from ED for Megan Rondini;
- 20. DCH Regional Medical Center Patient Visit Information of Megan Rondini on July 2, 2015-Dr. Nicholas Velrano and Activity Restrictions and Additional Instructions, and note for follow-up visit;
- 21. DCH Regional Medical Center Patient Health Summary of Megan Rondini dated July 2, 2015;

- 22. DCH Regional Medical Center Discharge work/school release of Megan Rondini dated July 2, 2015;
- 23. DCH Regional Medical Center Patient Portal Information for Megan Rondini;
- 24. DCH Regional Medical Center Functional and Cognitive Status form for Megan Rondini;
- 25. DCH Regional Medical Center records relating to assault;
- 26. DCH Regional Medical Center records document for password of Megan Rondini;
- 27. DCH Regional Medical Center files and records;
- 28. Letter from Kenda B. Dalyrymple, attorney for Dr. Cozart, to Sonya Cory dated July 29, 2016 and enclosures of Dr. Cozart's records relating to Megan Rondini;
- 29. Dr. Cozart's Mental Health Records Affidavit dated July 7, 2016;
- 30. Dr. Cozart's files and records relating to Megan Rondini;
- 31. Dr. Melanie Collins' files and records relating to Megan Rondini;
- 32. Lakeway Psychiatry and Behavioral Health files and records relating to Megan Rondini;
- 33. Dr. Ziba Rezaee's files and records relating to Megan Rondini;
- 34. Dr. Betty Bewley's files and records relating to Megan Rondini;

- 35. Dr. Susan Arnold's files and records relating to Megan Rondini;
- 36. American Academy of Psychiatry and Law Ethics Guidelines;
- 37. Dr. Long's expert report dated February 7, 2019;
- 38. Dr. Long's CV and list of cases;
- 39. Dr. Long index of documents resources;
- 40. Special Inquiry/Inquiry surveillance video at Bunn property;
- 41. Audio statement of Megan Rondini at DCH Regional Medical Center with Investigators Jones and Hastings on July 2, 2015;
- 42. Information from Megan Rondini's cell phone, including, but not limited to, text messages, social media (Facebook, Snapchats, Instagram, *etc.*), videos and notes;
- 43. Ciara Younger Interview;
- 44. Door from Bunn's bedroom;
- 45. Photos of handgun taken by investigators;
- 46. Houndstooth Condominium videos/photos on night of alleged incident;
- 47. Jason Barksdale interview by investigators;
- 48. Megan Rondini's interviews (videos, audio and transcripts) by investigators;
- 49. Megan Rondini's audio interview with investigators going to her apartment;

- 50. Photographs/Snapchats of the inside of Bunn's house taken by Megan Rondini on date of alleged incident;
- 51. Photographs of Bunn taken by Megan Rondini at Innisfree on November 27, 2014;
- 52. IPhone extraction report from police;
- 53. Scene photographs taken by Josh Hastings;
- 54. Scene photographs taken by Adam Jones;
- 55. Scene photographs taken by other investigators;
- 56. Recorded communications (audio/video) of Bunn with investigator at Bunn's home on July 2, 2015;
- 57. Dallas Police Incident/Investigation reports and records;
- 58. List of names/initials created by Megan Rondini in notes section of cell phone;
- 59. Megan Rondini photograph of hickey;
- 60. Tuscaloosa Police Incident Report dated July 2, 2015;
- 61. SMU Mental Health files and records relating to Megan Rondini;
- 62. Tuscaloosa County Homicide Unit files and records relating to Special Inquiry, Case No. 150702030;
- 63. Documents relating to prescriptions for Megan Rondini and payments for prescriptions;

- 64. Handwritten report of Megan Rondini from TCHU;
- 65. Handwritten statement of Megan Rondini to Tuscaloosa Police Department dated July 2, 2015;
- 66. Affidavit of Adam Jones;
- 67. Affidavit of Scotty Rogers;
- 68. Selfie video of Megan Rondini dated on or about May 27, 2015;
- 69. State of Texas Certification of Vital Record Death Certificate of Megan Elizabeth Rondini;
- 70. SMU Health History Form of Megan Rondini dated February 24, 2016;
- 71. Notice of "How Medical Information About You May Be Used and Disclosed and How You Can Get Access to this information" Effective April 11, 2003 Pamela G. Hamilton, M.D.; Thomas W. Lucas, M.D.; Mihaela V. Stoica, M.D., 4300 MacArthur Avenue, Suite 260 Dallas, TX 75209;
- 72. SMU Student Health Form of Megan Rondini dated November 23, 2015;
- 73. SMU Current Medication List of Megan Rondini dated February 24, 2016;
- 74. SMU Forms with the following completed information relating to Megan Rondini -- Medical History; Social History; Current and Past

- List of Substance Use, History of Legal Problems; Educational History; Major Losses, Changes or Crisis in Life; Occupational History; Military History; Relationship History and Primary Care Provider Contact Information;
- 75. SMU "Problems" Form of Megan Rondini dated February 24, 2016;
- 76. SMU "Appendix E Release of Information for Communication with Primary Care Provider" signed by Megan Rondini dated February 24, 2016;
- 77. SMU "Telephone" schedule;
- 78. SMU "Appointment Verification and Cancellations;
- 79. Drs. Pamela Hamilton; Thomas W. Lucas; Sidney A. Kelt, Jr., and Mihaela Stocia, "Philosophy of Treatment;
- 80. Form for Center for Neurologic Study-Lability Scale (CNS-LS) for pseudobulbar affect (PBA) of Megan Rondini dated February 24, 2016;
- 81. SMU Review of Systems Form of Megan Rondini dated February 24, 2016;
- 82. SMU Mood Disorder Questionnaire of Megan Rondini;
- 83. SMU Mental Health Center Policies financial; emergencies and prescription refills;

- 84. SMU Health Center and Mental Health Center files and records related to Megan Rondini;
- 85. Westlake Medical Center records relating to Megan Rondini, including, but not limited to, those records dated July 6, 2015);
- 86. Photographs of Megan Rondini's apartment, including photograph of July 2, 2015;
- 87. Megan Rondini's July 2015 cell phone bill;
- 88. SMU emails and attachments Vogel;
- 89. SMU emails and attachments Hall;
- 90. SMU emails and attachments Waggoner;
- 91. South Western Institute of Forensics Sciences at Dallas Office of Medical Examiner Autopsy Report of Megan Rondini
- 92. University of Alabama Title IX Office files and records relating to Megan Rondini;
- 93. Innisfree surveillance video/photograph at 7:27 p.m. on July 1, 2015
- 94. Innisfree surveillance video/photograph at 8:19 p.m. on July 1, 2015
- 95. Innisfree surveillance video/photograph at 11:35 p.m. on July 1, 2015
- 96. Innisfree surveillance video/photograph at 11:36 p.m. on July 1, 2015
- 97. Innisfree surveillance video/photograph at IF at 11:31 p.m. on July 1, 2015;

- 98. Innisfree surveillance video/photograph at 11:31 p.m. on July 1, 2015
- 99. Innisfree surveillance video/photograph #2 at 11:31 p.m. on July 1, 2015;
- 100. All Innisfree surveillance videos/photographs (including those attached as exhibits to Adam Jones' deposition);
- 101. Megan Rondini's Snapchat photos of trophy room at Bunn's house
- 102. Invoice for Dr. Ziv's expert witness charges
- 103. Dr. Ziv's CV;
- 104. Dr. Ziv's expert report;
- 105. Dr. Ziv's case list;
- 106. Megan Rondini text messages from July 1 and July 2, 2015;
- 107. Dallas Police records;
- 108. Megan Rondini handwritten note regarding alleged sexual assault;
- 109. Megan Rondini text messages after July 2, 2015;
- 110. Scott Meyer letters;
- 111. Selfie of Megan Rondini taken in Bunn's house on July 2, 2015 at 1:12 a.m.;
- 112. Surveillance photo of Bunn entering Innisfree around 7:30 on July 1, 2015;

- 113. Surveillance photo of Megan Rondini entering Innisfree (no time stated);
- 114. Surveillance photo of Megan Rondini leaving Innisfree at 11:35 p.m.;
- 115. Text messages between Megan Rondini and Mike Rondini on July 2, 2015;
- 116. Text messages from Megan Rondini's cell phone from July 1, 2015 beginning at 11:39 p.m., including texts from Bridget Bernarding and Michelle Arcia;
- 117. Text messages from Megan Rondini's cell phone from November 27, 2014;
- 118. Text messages from Megan Rondini's cell phone from September 28, 2013;
- 119. American Psychiatric Association pamphlet regarding PTSD;
- 120. Dr. Arnold's notes from meeting with Megan Rondini (UA/Rondini 00009-00013) and intake sheet;
- 121. Dr. Arnold's notes from meeting with Megan Rondini (UA/Rondini 00007);
- 122. Photographs of Bunn's bedroom;
- 123. Photographs of window in Bunn's bedroom;
- 124. Photographs of window (with and w/o curtain) in Bunn's bedroom;

- 125. Photographs of Bunn's pants and shirt from July 2, 2015;
- 126. Photographs of Bunn's bedside drawer from July 2, 2015;
- 127. Photographs of door of Bunn's bedroom from July 2, 2015;
- 128. Photographs of Bunn's bedding from July 2, 2015;
- 129. Newspaper advertisement -- Character Assassination in the Internet Age;
- 130. Tuscaloosa District Attorney case file;
- 131. Alabama Uniform Incident/Offense Report dated July 2, 2015;
- 132. University Park Police Department Incident Report dated February 26,2015;
- 133. Tuscaloosa County Probate Court records In the Matter of the State of Megan Elizabeth Rondini, Case No.: 2016-931;
- 134. Tuscaloosa County Circuit Court records for CV 2017-000016;
- 135. Facts of Death Verification as they will appear on Certificate of Death signed by Michael Rondini dated March 1, 2016;
- 136. Joint Statement from the Rondini Family and University of Alabama dated February 2018;
- 137. Emails between Michael Rondini and Facebook;
- 138. Emails between Josh Hastings and Michael Rondini on April 7, 2016;
- 139. Crimson Urgent Care files and records relating to Megan Rondini;

- 140. LabCorp Invoice 12550282;
- 141. The Austin Diagnostic Clinic files and records relating to Megan Rondini;
- 142. Capital Otolaryngology files and records relating to Megan Rondini;
- 143. Renaissance Women's Group files and records relating to Megan Rondini;
- 144. Quest Diagnostics files and records relating to Megan Rondini;
- 145. Central Texas OB/GYN Associates files and records relating to Megan Rondini;
- 146. On-Call Incident Report by University of Alabama;
- 147. Cindy Rondini's cell phone bill from June 24, 2015 July 23, 2015;
- 148. Keystone Psychological Services email dated August 2, 2015 to Megan Rondini;
- 149. Innisfree receipts of Megan Rondini and Bunn on date of alleged incident.
- 150. Texts between Megan Rondini and the following individuals: Abby Flickenger; Amy Intagsgala; Ashlee Quetham; Ciara Younger; Cindy Rondini; Michael Rondini; Courtney Rentas; Elizabeth Aune; Emily Oulton; Haley Whighman; Hannah Carter; Hannah Pope; Kara

- Whelply; Leslie Andres; Marg Geppert; Mary Pat Peeples; Meg Ryan; Michella Arcia; Sammie Auer; Wes Barbee;
- 151. University of Alabama Women and Gender Resource Center files and records relating to Megan Rondini;
- 152. University of Alabama Student Health Center files and records relating to Megan Rondini;
- 153. Cigna Healthcare files and records relating to Megan Rondini;
- 154. Starkmark Insurance Company files and records relating to Megan Rondini;
- 155. CVS, 7300 North FM 620, Austin, Texas 78726 files and records relating to Megan Rondini;
- 156. Any exhibit listed by Plaintiff, which is not objectionable;
- 157. Any exhibit necessary for rebuttal;

Respectfully submitted on this the 20th day of August, 2021.

#### /s/ Richard E. Smith

Richard E. Smith (ASB-6536-M69R) Rachel J. Moore (ASB-8944-O64R) W. Ivey Gilmore (ASB-4395-I66W) Attorneys for Defendant, Terry J. Bunn, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of August, 2021, I electronically filed the foregoing document with the CM/ECF E-Filing Website system, which will send notification of such filing to the following e-mail addresses:

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